

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA

**SEALED**

SEALED

v.

Case No. 12-mj-11

SINOVEL WIND GROUP CO., LTD.,

Defendant.

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COMPLAINT FOR VIOLATION OF TITLE 18,  
UNITED STATES CODE, SECTIONS 1832 AND 2

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BEFORE United States Magistrate Judge  
Stephen L. Crocker

United States District Court  
120 North Henry Street  
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

COUNT 1

On or about March 7, 2011, in the Western District of Wisconsin and  
elsewhere, the defendant,

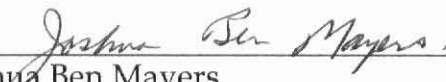
SINOVEL WIND GROUP CO., LTD.,

by and through others, with the intent to convert a trade secret that is related to a  
product that is used and intended for use in interstate and foreign commerce,  
specifically, the source code development folder for the PM3000, which included source  
code version 5650414\_R1, the then most recent version of the PM3000 source code, to  
the economic benefit of SINOVEL WIND GROUP CO., LTD., not the owner the trade  
secret, and knowing and intending that the offense would injure the owner of the trade

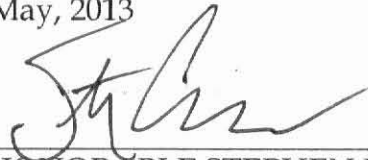
secret, knowingly and without authorization copied, duplicated, downloaded, replicated, and conveyed such information.

(In violation of Title 18, United States Code, Sections 1832(a)(2) and 2).

This complaint is based on the attached affidavit of Special Agent Joshua Ben Mayers, Federal Bureau of Investigation, Madison, Wisconsin.

  
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Joshua Ben Mayers  
Federal Bureau of Investigation/SA

Sworn to before me this 30<sup>th</sup> day of May, 2013

  
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HONORABLE STEPHEN L. CROCKER  
United States Magistrate Judge